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**FILED**  
**U.S. MAGISTRATE JUDGE**

**DATE:** August 31, 2022

**TIME:** 10:30 a.m.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

United States of America,  
  
Plaintiff,

v.

MICHAEL DEWAYNE PETERSON,  
  
Defendant.

Case No. 2:22-mj-00689-EJY

**COMPLAINT** for violation of:

Simple Assault  
49 U.S.C § 46506 and 18 U.S.C. §  
113(a)(5);

Indecent Exposure 49 U.S.C § 46506  
and DC code 22-1312;

BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned  
complainant, being first duly sworn, states that:

COUNT ONE  
Simple Assault  
(49 U.S.C. § 46506 and 18 U.S.C. §113(a)(5))

On or about June 1, 2022, within the special aircraft jurisdiction of the United  
States, specifically, onboard Delta Airlines flight 949 from Atlanta, Georgia to Las Vegas,  
Nevada, terminating at the Harry Reid International Airport, Las Vegas, Clark County,  
Nevada,

**MICHAEL DEWAYNE PETERSON,**

1  
2 defendant herein, did assault A.C., all in violation of Title 18, United States Code, Section  
3 113(a)(5).

4 COUNT TWO  
5 Indecent Exposure  
6 (49 U.S.C § 46506 and DC Code 22-1312)

7 That on or about June 1, 2022, within the special aircraft jurisdiction of the United  
8 States, specifically, onboard Delta Airlines flight 949 from Atlanta, Georgia to Las Vegas,  
9 Nevada, terminating at the Harry Reid International Airport, Las Vegas, Clark County,  
10 Nevada,

11 **MICHAEL DEWAYNE PETERSON,**  
12 defendant herein, made an obscene and indecent exposure of his genitalia, and engaged in  
13 masturbation, all in violation of Title 49, United States Code 46506 and DC code 22-1312.

14 Complainant, as and for probable cause, states the following:

15 1. Complainant is a Special Agent with the Federal Bureau of Investigation, Las  
16 Vegas Division, and has been employed as a Special Agent for four years.

17 2. The following information is the result of my own personal involvement in  
18 this investigation, as well as information and reports provided to me by other law  
19 enforcement officers:

20 (a) On June 1, 2022, Las Vegas Metropolitan Police Department  
21 (LVMPD) officers responded to a report that a male passenger on inbound Delta Airlines  
22 flight 949, scheduled from Atlanta, Georgia, to Las Vegas, Nevada, engaged in  
23 masturbation in front of a female passenger, pulled his penis out of his pants, and grabbed  
24 the female passenger. LVMPD officers prepared an initial report and relayed the following  
details to your complainant:

1 (b) The victim, A.C., was located in seat 21B during the above-described  
2 flight. **MICHAEL DEWAYNE PETERSON** was located in seat 21A. **PETERSON** and  
3 A.C. had no association prior to the flight and were not travelling together. A.C. reported  
4 that, during the flight, **PETERSON** repeatedly stared at her. Multiple times, as  
5 **PETERSON** was staring at A.C., he would put his hands down his pants and pull out his  
6 penis so that it was visible to A.C. She further reported that **PETERSON** had his hands in  
7 his pants for the duration of the flight, making gestures that appeared as though he was  
8 masturbating.

9 (c) Approximately ten minutes before landing, **PETERSON** typed a  
10 message on his cell phone and placed his cell phone on A.C.'s lap. The message said, "Can  
11 I take you out so we can have sex?" A.C. verbally responded, "No," and then **PETERSON**  
12 typed on his phone "Yes." At that point, **PETERSON** grabbed A.C.'s inner thigh. A.C. hit  
13 **PETERSON**'s hand away, and verbally stated, "Do not touch me!" **PETERSON** laughed  
14 and looked out the window.

15 (d) After the plane landed, A.C. stated that **PETERSON** exited the plane  
16 very fast. A.C. attempted to report the incident to a Delta Airlines flight attendant, but the  
17 flight attendant told A.C. she would have to report it to the gate agent since the flight  
18 already landed. The gate agent called a supervisor, who dispatched Las Vegas  
19 Metropolitan Police Department (LVMPD) officers.

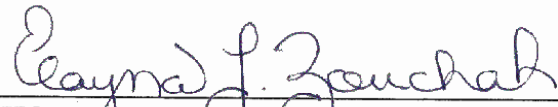
20 (e) Your complainant conducted a follow up interview of A.C. on June  
21 9, 2022, and A.C. reported all the same details to your complainant as recorded in the  
22 initial report. A.C. also provided a video of **PETERSON** appearing to masturbate to your  
23 complainant, which A.C. recorded on her cell phone during the flight.  
24

1  
2 (f) Based on the above facts and circumstances, your complainant  
3 believes there is probable cause that **PETERSON**, did violate Title 18 United States Code,  
4 section 113(a)(5) Simple Assault; as well as DC code 22-1312 Indecent Exposure while in  
5 the special aircraft jurisdiction of the United States.

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8 ERIN WALSH, Special Agent  
9 Federal Bureau of Investigation

10 Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
11 telephone on August 31, 2022.

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14 HONORABLE ELAYNA J. YOUCHAH  
15 UNITED STATES MAGISTRATE JUDGE  
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